FEDERAL ELECTION COMMISSION

999 E Street, N.W. Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 98NF-15 DATE ACTIVATED: 1/26/99

STAFF MEMBER: April Sands

Clinett Short

SOURCE:

INTERNALLY GENERATED

RESPONDENTS:

Ohio Right to Life Society PAC

and Robert Knodel, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i)

INTERNAL REPORTS CHECKED:

Disclosure Reports

Referral Material

FEDERAL AGENCIES CHECKED:

None

I. **GENERATION OF MATTER**

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on December 29, 1998. The basis of the referral is the failure of the Ohio Right to Life Society PAC, and Robert Knodel, as treasurer, to file timely its 1998 July Quarterly Report during the 1997-1998 election cycle.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe the respondents violated 2 U.S.C. § 434(a)(4)(A)(i).

III. **DISCUSSION**

IV. RECOMMENDATIONS

- 1. Open a MUR.
- 2. Find reason to believe the Ohio Right to Life Society PAC and Robert Knodel, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and take no further action.
- 3. Approve the attached Factual and Legal Analysis, and the appropriate letter.
- 4. Close the file.

Lawrence M. Noble General Counsel

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BY:

Lois G. Lerner

Associate General Counsel

Attachments:

1. Factual and Legal Analysis